

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

State of Illinois, Department of Transportation, and City of Chicago	:	
Petitioners,	:	
	:	
v.	:	T11-0008
	:	
Union Pacific Railroad Company	:	
Respondent.	:	
	:	
Petition for authorization to relocate the Union Pacific Railroad over Illinois Route 19 (Irving Park Road) grade separation in the City of Chicago, Cook County, designated as AAR/DOT # 174 051R, Railroad Milepost 5.46, from approximately 1.2 Miles east of York Road to approximately 400 feet east of York Road.	:	

STAFF MOTION TO CONSOLIDATE ACTION

NOW COMES the Staff of Illinois Commerce Commission’s Rail Safety Section (“Staff”), and for its Motion to Consolidate Action, states as follows:

1. The Illinois Department of Transportation (“Department” or “IDOT”) and the City of Chicago (“City”) are seeking authorization to relocate the Union Pacific Railroad Company’s (“UP”) bridge over Illinois Route 19 (Irving Park Road) designated as AAR/DOT #174 051R, railroad milepost 5.46, in the City of Chicago, Cook County.
2. The Department also filed a separate action entitled “Department of Transportation v. Canadian Pacific Railway, Docket No. T11-0009,” requesting authorization to construct a new bridge carrying the Canadian Pacific Railway Company’s (“CP”) tracks over Illinois Route 19 (Irving Park Road).
3. Staff has participated in various coordination meetings with the parties noted in each matter, and assisted in the preparation of the Petitions for the structures which will be located within close proximity to each other (approximately 100 feet).
4. With the projects overlapping in work items and project limits, the subject matter of this case should be consolidated with Docket No. T11-0009 with a single Hearing held before the Administrative Law Judge. This is further necessitated by the construction schedules for the projects, and the close proximity of the Illinois Route 19/CP at-grade crossing, which will remain open during construction.

WHEREFORE, Staff respectfully requests that:

1. This matter (Docket No. T11-0008) be consolidated with Docket No. T11-0009.
2. That one Hearing be held on February 23, 2011, at 10:00 am.
3. For other just and appropriate relief.

Respectfully Submitted



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Certificate of Service

I, Brian Vercruysse, Senior Rail Safety Specialist for the Illinois Commerce Commission, hereby certify that the MOTION TO CONSOLIDATE ACTION for T11-0008 and T11-0009 was docketed on e-Docket and e-mailed to the parties listed below.

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